

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DEBORAH S. SKEANS, Executrix of the  
ESTATE OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE LLC,  
KEY COMMERCIAL FINANCE  
PROPERTIES, LLC, EQUITY PROS, LLC,  
and MOBILE AGENCY, LLC,

Defendants.

C.A. No. 1:18-cv-01516-UNA

**MOTION FOR A PRELIMINARY INJUNCTION  
FREEZING ASSETS HELD OR CONTROLLED BY DEFENDANTS**

Plaintiff, Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis, moves for entry of a preliminary injunction freezing the assets held or controlled by Defendants, Key Commercial Finance LLC, Key Commercial Finance Properties, LLC, Equity Pros, LLC, and Mobile Agency, LLC, in order to prevent the wasting of any assets, pending further order of this Court. The grounds for this motion are set forth in detail in the accompanying Memorandum of Law in Support of Motion for Temporary Restraining Order and Preliminary Injunctive Relief, which is filed contemporaneously with this motion.

STRADLEY RONON STEVENS & YOUNG, LLP

/s/ Joelle E. Polesky

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Dated: October 1, 2018

*Attorneys for Plaintiff, Deborah S. Skeans,  
Executrix of the Estate of Frank E. Pavlis*

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**ORDER**

**AND NOW**, this \_\_\_\_ day of October, 2018, upon consideration of the *Motion for a Preliminary Injunction Freezing Assets Held or Controlled by Defendants*, it is **ORDERED** that the *Motion* is **GRANTED**.

It is **ORDERED** as follows:

1. All assets in the custody or control of Defendants, Key Commercial Finance LLC, Key Commercial Finance Properties, LLC, Equity Pros, LLC, and Mobile Agency, LLC, are frozen and no assets may be spent, paid, disbursed, expended, distributed, liquidated, transferred, transmitted, conveyed, reimbursed, returned, repaid, encumbered, or otherwise depleted, dissipated, or wasted.

2. Defendants, and any affiliated individuals, including officers and employees, are **ENJOINED** from taking any action to spend, pay, disburse, expend, distribute, liquidate, transfer, transmit, convey, reimburse, return, repay, encumber, or otherwise deplete, dissipate, or waste any assets absent an order of approval by this Court.

3. To the extent any of the foregoing actions are currently in process, Defendants, their officers and employees, and any other affiliated professionals are **ORDERED** to take all steps available to cancel, revoke, rescind, annul, and terminate any such actions, and, to the maximum extent possible, those parties shall take all steps available to reverse and unwind any such transactions so those assets may be held pending resolution of this suit on the merits.

4. Notwithstanding the foregoing, Defendants are permitted to expend such funds as are necessary to continue daily operations, including, but not limited to, overhead costs such as utilities and rent, employee salaries and benefits, and vendor and professional invoices.

5. Any violation of this Order will subject the offending party to an order holding such party in contempt of court, and will result in the imposition of sanctions and penalties as permitted and provided by law.

6. Plaintiff, Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis Frank Pavlis, by and through his Estate, will post a bond in the amount of \_\_\_\_\_, as required under Federal Rule of Civil Procedure 65(c).

7. Defendants are **ORDERED** to promptly provide a copy of this Order to their respective Presidents, Officers, Boards, Members, banking institutions, and all other professionals and/or entities that have dealings relative to any assets held or controlled by any one or more of the Defendants.

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J.